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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**STEVEN M. GALLAGHER, a/k/a “Alexander
Delarge 655321,”**

Defendant.

AMENDED COMPLAINT

21 Civ. 8739 (PKC)(GWG)

ECF Case

JURY TRIAL DEMANDED

Plaintiff Securities and Exchange Commission (“Commission”), for its Amended Complaint against Defendant Steven M. Gallagher (“Gallagher” or “Defendant”), alleges as follows:

SUMMARY

1. The Commission filed its Complaint in this matter on October 26, 2021 to halt Defendant’s ongoing violations of the federal securities laws.
2. Simultaneous with the filing of its Complaint, and to prevent continuing harm to investors, the Commission filed an Ex Parte Emergency Application for an Order to Show Cause

and Temporary Restraining Order Enjoining Defendant from Continuing Violations of the Securities Laws, Freezing His Assets and Granting Other Relief (“Emergency Application”).

3. On October 26, 2021, the Court granted the Commission’s Emergency Application in its entirety, including entering a temporary restraining order freezing up to \$6.9 million in Gallagher’s assets and restraining Gallagher from ongoing and future violations of the securities laws with which he was charged in the Complaint.

4. On November 30, 2021, the Court entered a Preliminary Injunction Order, on consent of the parties, preliminarily enjoining Gallagher from any ongoing and future violations of the securities laws with which he was charged in that Complaint and freezing Gallagher’s assets up to \$6.9 million pending a final disposition of this case, among other relief.

5. On October 26, 2021, the same day the Commission filed the initial Complaint in this case, Gallagher was arrested in connection with a criminal Complaint filed by the U.S. Attorney’s Office for the Southern District of New York. On February 25, 2022, Gallagher pled guilty in the United States District Court for the Southern District of New York to a criminal Information that charged him with one count of using a manipulative and deceptive device and contrivance in connection with the purchase or sale of securities, in violation of Title 17, United States Code, Sections 78j(b) and 78ff; Title 17, Code of Federal Regulations, Section 240.10b-5; and Title 18, United States Code, Section 2.

6. The Information to which Gallagher pled guilty charged that he used Twitter to misrepresent the nature of his personal financial stake in the securities of SpectraScience Inc. (“SCIE”), in order to induce others to purchase SCIE stock, and thereby drive up the stock’s price, while Gallagher simultaneously and secretly sold his own previously acquired shares at an artificially inflated price. He is scheduled to be sentenced on June 27, 2022.

7. As set forth in more detail below, since at least December 2019 and continuing to at least October 2021, Gallagher used his Twitter platform to promote and encourage the purchase of dozens of specific microcap stocks, while simultaneously selling his own shares and not disclosing that fact (a practice known as “scalping”).

8. Scalping is a scheme or artifice to defraud in which a defendant (i) acquires shares of a stock; (ii) recommends that others purchase the stock without disclosing his intention to sell; and (iii) subsequently sells the stock for his own benefit.

9. As part of his scalping scheme, Gallagher also, on some occasions, disseminated false and/or misleading information about the promoted issuers, or falsely stated that he was not selling the stock that he was concurrently recommending that his Twitter followers and others who read his tweets buy. For at least two issuers, Gallagher also engaged in multiple instances of manipulative trading by placing multiple buy orders at the end of the trading day to raise the stocks’ price (“marking the close”) with the intent to mislead the public about the trajectory of the stocks’ price and induce others to buy the stocks. “Marking the close” is the term used to describe the practice of buying or selling stocks near the close of trading to affect the closing price.

10. Gallagher engaged in scalping in connection with the stock of at least 60 issuers identified to date (as summarized in the chart contained in Attachment A to this Amended Complaint and incorporated by reference herein) and generated at least \$2,805,600 in net trading profits from the sale of securities of the 60 issuers over the analyzed period of his fraudulent and manipulated scheme.¹

¹ The “net profits” identified in Attachment A represent Gallagher’s net trading profits from when he first started buying a stock to when he last sold it. They are based on evidence currently known to the Commission; the Commission’s investigation is ongoing and, as a result, the “net profits” include certain gains and certain losses that may not ultimately be factored into the final

11. In addition to the evidence regarding Gallagher's illegal conduct set forth herein, Attachment B to this Amended Complaint, which is incorporated by reference herein, provides additional examples of Gallagher's scalping in connection with the stock of each of the 60 issuers. The tweets cited in Attachment B were tweeted from the Twitter account @AlexDelarge6553, which Gallagher controlled.

12. Gallagher's touts via public tweets and private direct messages (commonly referred to as "DMs") encouraged his followers and readers to buy shares in specific issuers while not disclosing that Gallagher was selling, or would be imminently selling, shares in those very same issuers. For example, as shown in Attachment B, on January 25, 2021, Gallagher tweeted, "\$hdii you'll want to load!" In this tweet, Gallagher was telling his followers and readers to buy ("load") securities of the issuer Hypertension Diagnostics, Inc. ("HDII"). Yet despite Gallagher's encouragement to his followers and readers to buy HDII, Gallagher sold hundreds of thousands of shares of HDII that same day.

13. In addition, despite repeated, written warnings from his brokerage firm ("Broker A") that he appeared to be engaged in manipulative trading in violation of securities laws and regulations, Gallagher continued to engage in manipulative trading and scalping. On September 9, 2021, Broker A informed Gallagher that it was closing his trading account effective October 9, 2021, and that it would immediately prevent him from making new stock purchases, restrict his account to just liquidating transactions, and not allow him to open a new account in the future.

14. Despite these warnings and termination, Gallagher continued to engage in scalping through sales of stock he already held in his Broker A account. In addition, on the very

disgorgement calculation. Additional illegal trades may also be identified as the case proceeds. For these and other reasons, the "net profits" do not represent the precise amount of disgorgement the Commission will seek after discovery is complete in this case.

day that Broker A told Gallagher it was shutting down his account, Gallagher opened a trading account at Broker B, indicating that he intended to use the account for “active/day trading.” As of October 14, 2021, that account had approximately 40 penny stocks in it, with a market value of approximately \$1 million, and Gallagher continued to engage in scalping stocks in that account through at least October 13, 2021, undeterred by the prior warnings from Broker A.

15. Simultaneous with the filing of the Complaint, the Commission established a victims email box and asked all persons who believed that they may be victims of Gallagher and his @AlexDelarge6553 twitter account to submit an email to the Commission staff at AlexDelarge6553Victims@SEC.GOV.

16. The AlexDelarge6553Victims email box has received emails from sixty-two investors through March 2022. Commission staff has interviewed a number of these investors and the interview process is ongoing.

17. The victims interviewed to date include novice, retail investors, including active duty and retired military personnel, persons on limited incomes and of moderate means, elderly persons and persons with health concerns who are on disability. The victims identified fifty-four issuers they invested in based on tweets and recommendations of @AlexDelarge6553, including certain issuers Gallagher is charged with scalping herein.

18. Gallagher’s victims believed the plain meaning of Gallagher’s tweets: that Gallagher was buying the shares of the issuers he recommended, was holding his shares in issuers he represented he was holding, and was not selling his shares when he was telling his followers they should buy shares in the same company.

19. Gallagher’s failure to disclose that he was selling shares while encouraging his Twitter followers and readers to buy those shares was integral to his scalping scheme, was a

material omission, and harmed numerous investors.

20. As reflected in the victim interview summaries below, victims reasonably relied upon Gallagher's advice because he portrayed himself as an experienced trader willing to help others benefit from his knowledge, and they reasonably trusted Gallagher based on the content of his tweets that said he wanted to raise money to fight cancer and to help people make money.

21. The fact that Gallagher was selling shares shortly after he was telling his followers and readers to buy shares in the same company and, at times, going one step further and falsely reassuring his followers that he was holding such shares and not selling them, was material information that his followers, and any other reasonable investor, would have wanted to know before making a decision whether to buy the shares Gallagher was recommending.

22. Gallagher did not disclose this material information to his followers and readers.

23. The Commission seeks: (1) a permanent injunction enjoining Gallagher from ongoing and future violations of the federal securities laws and rules this Amended Complaint alleges he has violated; (2) disgorgement of Gallagher's ill-gotten gains and prejudgment interest thereon; (3) imposition of a civil money penalty; and (4) imposition of a penny stock bar.

VIOLATIONS

24. By virtue of the foregoing conduct and as alleged further herein, Gallagher's fraudulent and manipulative conduct violates Section 17(a) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. § 77q(a)]; Section 9(a)(2) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78i(a)(2)] and Section 10(b) [15 U.S.C. § 78j(b)] of the Exchange Act and Rule 10b-5 [17 C.F.R. § 240.10b-5] thereunder.

25. Unless Gallagher is restrained and enjoined, he will engage in the acts, practices, transactions, and courses of business set forth in this Amended Complaint or in acts, practices,

transactions, and courses of business of similar type and object.

NATURE OF THE PROCEEDINGS AND RELIEF SOUGHT

26. The Commission brings this action pursuant to the authority conferred upon it by Securities Act Sections 20(b) and 20(d) [15 U.S.C. §§ 77t(b) and 77t(d)] and Exchange Act Section 21(d) [15 U.S.C. § 78u(d)].

27. The Commission seeks a final judgment: (a) permanently enjoining Gallagher from violating the federal securities laws this Amended Complaint alleges he has violated; (b) ordering Gallagher to disgorge all ill-gotten gains and/or unjust enrichment he has received as a result of the violations alleged herein and to pay prejudgment interest thereon, pursuant to Exchange Act Sections 21(d)(5) and 21(d)(7) [15 U.S.C. §§ 78u(d)(5) and 78u(d)(7)]; (c) ordering Gallagher to pay civil money penalties pursuant to Securities Act Section 20(d) [15 U.S.C. § 77t(d)] and Exchange Act Section 21(d)(3) [15 U.S.C. § 78u(d)(3)]; (d) permanently prohibiting Gallagher from participating in any offering of a penny stock, pursuant to Securities Act Section 20(g) [15 U.S.C. § 77t(g)] and Exchange Act Section 21(d)(6) [15 U.S.C. § 78u(d)(6)]; and (e) ordering any other and further relief the Court may deem just and proper.

JURISDICTION AND VENUE

28. This Court has jurisdiction over this action pursuant to Securities Act Section 22(a) [15 U.S.C. § 77v(a)] and Exchange Act Section 27 [15 U.S.C. § 78aa].

29. Defendant, directly and indirectly, has made use of the means or instrumentalities of interstate commerce or of the mails in connection with the transactions, acts, practices, and courses of business alleged herein.

30. Venue lies in this District under Securities Act Section 22(a) [15 U.S.C. § 77v(a)] and Exchange Act Section 27 [15 U.S.C. § 78aa]. Defendant transacted business in the Southern

District of New York, and certain of the acts, practices, transactions, and courses of business alleged in this Amended Complaint occurred within this District. For example, the Depository Trust & Clearing Corporation (“DTCC”), which clears all securities traded by the Defendant, is based in this District and various trades executed by the Defendant were cleared, in whole or in part, through DTCC computers located in this District.

DEFENDANT

31. **Gallagher**, age 51, resides in Maumee, Ohio. Between at least September 2019 and continuing until at least October 2021, he controlled a Twitter account in the name of “Alexander Delarge 655321”, with the handle @AlexDelarge6553, that he used primarily to promote microcap securities. Under the @AlexDelarge6553 handle, Gallagher has tweeted screenshots of portions of his brokerage records that, in fact, match Gallagher’s brokerage records. Gallagher had over 70,000 Twitter followers as of October 2021 and an undetermined number of persons who read his tweets.

FACTS

I. SUMMARY OF GALLAGHER’S SCALPING SCHEME

32. As alleged below, from at least December 2019 and continuing until at least October 2021, Gallagher engaged in a fraudulent scheme to promote and manipulate primarily OTC quoted and traded securities,² using his Twitter account with the handle @AlexDelarge6553, by encouraging investors to buy specific securities (the “Target Securities”), while at the same time — contrary to his advice to his tens of thousands of Twitter followers, as well as to the viewing public who read his Twitter posts — selling his own holdings

² OTC securities refers to securities quoted and traded on OTC Link, owned by OTC Markets Group Inc. Most of the Target Securities are what are commonly referred to as “penny stocks,” which typically trade over OTC Link for fractions of a penny per share.

of those securities into the inflated price and liquidity that his tweets helped create.

33. Gallagher often initially communicated by private direct messaging (“DMs”) on Twitter with a small, select group of other Twitter users (“associates”) about potential issuers to manipulate, choosing issuers that had: a large public float, i.e., a large quantity of shares on the public market; and a low price per share (generally, a fraction of a cent).

34. Gallagher typically acquired millions of shares of a Target Security in advance of his promotional campaign — a practice he referred to as “loading” (also commonly known as “frontloading”). He also often reached an agreement with select associates on a date and time when they would start publicly tweeting a message telling his followers and public viewers to buy the Target Security.

35. Gallagher referred to the public signal to begin buying as the “Alert.” For example, Gallagher told an associate in a DM on November 28, 2020 “afom [the OTC ticker symbol for All for One Media Corp.] try not to push that so i can load for a latter alert next week.”³ Gallagher evidently was asking his associate not to encourage (“push”) others to buy AFOM, which would raise the stock price, before Gallagher could purchase (“load”) AFOM shares at a lower price before he issued his Alert that was intended to encourage others to buy the stock thereby raising its price before he then sold his shares.

36. And, on November 30, Gallagher sent a DM to another associate: “im alert afom tomorrow thatll be the big run. im quiet with it now loading dips.” Gallagher’s reference to “loading dips” evidently means that he was buying (loading) shares of AFOM when the stock drops (dips) in price, prior to sending buy Alerts to his Twitter followers and readers.

³ Gallagher’s DMs and tweets, which often contain typographical and grammatical errors, are quoted verbatim herein.

37. Gallagher's statement: "im alert afom tomorrow thatll be the big run" indicates that Gallagher intended that his Alert to his followers and readers to buy AFOM would cause the stock's price to rise ("the big run").

38. Gallagher bought 20 million shares of AFOM on November 30 and tweeted a flashing red Alert when the market opened on the morning of December 1, 2020. The Alert had a flashing red graphic "ALERT!!!! ALEXANDER DELARGE" and stated: "Challenge alert!! \$afom this runs like no other!! Load and hold this is a swing multiple pennies fast!! Buy \$afom 500% runner today". "Runner" evidently means the stock will rise sharply in value. That same morning, after his Alert, Gallagher sold 13 million shares of AFOM for an approximate profit of \$42,000.

39. In many instances, after Gallagher had loaded up on shares of the Target Security — but before the Alert — he privately informed a small number of Twitter users in select stock private chat rooms that they should start acquiring shares in the Target Security because his Alert was imminent.

40. Gallagher alluded to this tactic in DMs with an associate prior to Gallagher's promotion of the penny stock Life on Earth, Inc. (OTC ticker: "LFER"), as follows: "im in 30 rooms ill let one at a time know and build slowly . . . ok end of day ill gather groups throughout the day . . . oh we will rock this easy" and "MOVING THIS GOOD TELLING PEOPLE IN DMS . . . Ok ive gotten 100s of buyers . . . im gonna alert to the masses you cool with that . . . WE A GOOD TEAM BUDDY".

41. Giving select associates and members of private chat rooms a heads up to start buying the Target Security before Gallagher's public Alert often increased the volume of trading and created an upward looking trend in the Target Security's price, making the stock look more

attractive to Gallagher’s intended victims when he would issue his public Alert.

42. The Alerts varied, but typically were accompanied by a GIF (short for Graphics Interchange Format, which is a short animated video clip) of a flashing red “ALERT!!!!” or occasionally, a siren. At other times, Gallagher built up to these red Alerts through a series of soft alerts, such as adding the issuer to a ranked list of his weekly stock picks. The red Alerts were often posted just prior to, or during, his sale of shares. The following is an example of a red Alert:

[\\$scie!](#) Challenge buy Alert trips to pennies hold and we all win big! The next [\\$enzc](#) watch it happen



43. “Trips” appears to refer to a price per share of \$0.0009 or less. In this tweet, Gallagher was apparently telling his followers and public viewers to buy shares of SCIE so that their coordinated purchases will move SCIE’s price per share from a thousandth of a cent to “pennies” per share, resulting in a profit.

44. Following Gallagher’s public Alert on Twitter — and after the momentum generated by the purchasing activity of Gallagher, his select associates and private chat room members — as the share price and trading volume of the Target Security began to increase, Gallagher began to sell his shares of the Target Security.

45. The Alerts were often followed by numerous additional tweets or retweets by Gallagher stating or implying that the Target Security was a buy (and/or hold) opportunity. A retweet consisted of Gallagher forwarding a stock recommendation tweet from another person to his Twitter followers and public viewers, often with added commentary by Gallagher either implicitly or explicitly endorsing the original tweet. Gallagher often retweeted tweets from his associates, with whom he had coordinated in DMs.

46. Gallagher's tweets and retweets varied but at times included false information about the issuer of the Target Security — such as publishing false and/or misleading tweets about a pending merger of LFER; false information that he was not selling (e.g. tweeting: “\$tsnp . . . Not selling!” — minutes before selling shares in the referenced Target Security [TSNP]; or falsely claiming that he did not benefit from sending his buy Alerts (e.g., tweeting, falsely, in reply to two Twitter users: “Never have I alerted a stock and sold.”) (“TSNP” was the OTC issuer Tesoro Enterprises, Inc.).

47. Gallagher engaged in scalping in connection with at least 60 securities, just within the period December 2019 to October 2021.

II. GALLAGHER'S SCIE SCALPING SCHEME

48. One of the stocks that Gallagher scalped was SpectraScience, Inc. (“SCIE”). Gallagher's conduct in connection with SCIE is typical of Gallagher's scalping in the other securities listed in Attachment A. Gallagher generated profits of approximately \$22,000 by engaging in a scheme to scalp shares of SCIE, which he traded between December 2020 and March 2021.

49. On December 5, 2020 (a Saturday), Gallagher and an associate (“Associate A”) exchanged private direct messages, in which they agreed to start promoting SCIE. Gallagher

asked Associate A by DM for some information about the company, but Associate A replied that “SCIE is just a shell with no guts but whenever [Individual A] starts pumping [Individual B] is behind it he usually messages me what’s up I’m going to message him.” Associate A appears to be communicating to Gallagher that SCIE has no business operations but that, given that Individual A is pumping (i.e., promoting) the stock, that usually means that Individual B is behind a plan to pump and dump that stock; and Associate A is planning to reach out to Individual B to find out what the plan is.

50. Gallagher then sent a DM to Associate B: “. . . if you keep scie quit so I can get in cheap ill try to give it a run starting Tuesday cool?”

51. As of December 2020, SCIE was an inactive Minnesota corporation whose shares were registered with the Commission and were quoted and traded on OTC Link.

52. SCIE was, as of December 2020, and continues to be, delinquent in its periodic filings with the Commission. It has not filed any quarterly or annual reports since it filed a Form 10-Q on November 14, 2017, for the period September 30, 2017. SCIE also has not filed any Forms 12b-25 explaining its inability to timely file those Forms 10-Q and Forms 10-K.

53. In its last filing with the Commission in 2017, SCIE was listed as being headquartered in San Diego, California and involved in the development of electromedical devices. However, during the period of Gallagher’s scalping of SCIE shares, both the telephone number and the website listed for SCIE on the OTC Markets website were inoperable.

54. A search for officers listed in SCIE filings did not identify current corporate officers or contact information. On-line photos of SCIE’s San Diego address in February 2021, during the events described below, indicate that the address provided for its corporate premises was empty inside and under renovation. SCIE also has not issued any press releases since at

least November 2017.

55. On Monday, December 7, 2020 at the market's open, Gallagher bought 10 million shares of SCIE at \$0.0003 per share. Later that morning, Gallagher began his campaign of public SCIE touts, including tweeting "i loaded this \$scie future alert i think," and, on December 8, "\$scie will have its day im loading these cheap levels. hint". On December 9, 2020, Gallagher bought another 6 million shares of SCIE at \$0.0003 per share.

56. On December 10, 2020, Gallagher tweeted "\$scie this is loading time FYI SHARING MY PLAYS", attaching a re-tweet with a false and/or misleading claim that "SCIE Will Begin meeting with the FDA towards the preparation and submission of Supplemental PMA filing with the FDA and plan for additional clinical trials to support eventual approval for sale in the United States !!". The claim appears to have been copied from SCIE's November 2017 Quarterly Report. Gallagher's tweet misleadingly suggested that SCIE was planning to meet with the FDA as of December 2020. In fact, SCIE did not file any Quarterly Reports after November 2017 and did not publish any press releases on its OTC Markets webpage after that date. Thus, these could not have been a basis for Gallagher's tout that SCIE had plans to meet with the FDA in December 2020.

57. On January 13, 2021, Gallagher bought another 10 million shares of SCIE for \$0.0003 per share and continued to tweet buy recommendations until, on January 27, 2021, Gallagher issued a red Alert to buy SCIE, which said: "\$scie! Challenge buy Alert trips to pennies hold and we all win big!" The red Alerts differ from Gallagher's other buy touts in their sense of urgency, with a flashing red GIF "ALERT!!!! ALEXANDER DELARGE". This red Alert was followed by approximately 20 more tweets that day by Gallagher touting SCIE, some containing false and/or misleading information about SCIE's current business operations, such

as:

SpectraScience, Inc. is focused on developing its WavSTAT Optical Biopsy System (WavSTAT). The WavSTAT employs a risk technology that optically illuminates tissue in real-time to distinguish between normal and pre cancerous or cancerous tissue. \$scie #buyscie; and

Cancer killing with patents. #buyscie.

58. Given that Gallagher had been advised that the company was a shell, and given the lack of public information regarding the company's actual, if any, business operations, Gallagher knew, or was reckless in not knowing, that these claims were false and/or misleading.

59. On January 27, 2021, Gallagher also sent a tweet to buy SCIE (in which he included a GIF of a group dancing together and the line "We're all in this together"). Gallagher's buy recommendations were clearly relied upon by various of his followers and readers, as evidenced, by way of example, by the enthusiastic responses to his recommendation from his followers, such as: (1) "I downloaded ameritrade just to follow your moves but don't have access to my funds until Friday morning.....the hurt of not being able to make moves"; (2) "#buyscie stick to the plan"; (3) "Actually was just running that through my head. It cant go down"; (4) "#buyscie I really hope this works"; (5) "YOU ARE THE MAN! BRILLIANT"; (6) "I m dancing boss ☺"; (7) "How soon can we buy again?"; (8) "I'm with you #buyscie"; (9) "I have a feeling I'll be loading more \$SCIE in the morning."

60. After the market closed on January 27, 2021, and despite his SCIE buy recommendations and his claim to his Twitter followers that: "We're all in this together," Gallagher entered four limit sell orders, each for the sale of 1 million shares at progressively higher prices beginning at \$0.0025, then \$0.0030, then \$0.0035 and finally at \$0.0040 per share — prices between approximately 177% and 344% higher than the closing price of \$0.0009 on that day. (A limit sell order can only be executed at the limit price or higher.)

61. On January 28, 2021, the sell orders were executed after the market opened. Minutes later, Gallagher entered a limit order to buy 1 million shares at \$0.0035 per share, and a second buy order around 10:15 am for 1 million shares at \$0.0024 per share, that were quickly executed. (A limit buy order can only be executed at the limit price or lower.) The limit buy orders were seemingly intended to support the share price and to maintain a false appearance of market demand.

62. Later that afternoon, Gallagher sold 1 million shares of SCIE at \$0.0019 per share. Throughout his selling on January 28, 2021 and continuing until well into the evening, Gallagher tweeted multiple touts encouraging his readers to buy SCIE shares. For example, he tweeted, “help please spread this word. We all need to know. \$scie #buyscie”, “My \$scie #buyscie order filled averaging up for the team! Buy smart sell smart we all win. FYI haven’t sold a share. . . .”, and “lets do it! \$scie #buyscie”. Gallagher’s reference in his tweet to his buy “order filled averaging up for the team” points to the purpose of his placing buy orders, i.e., to support SCIE’s share price and create a false appearance of market demand.

63. The following day, January 29, Gallagher sold virtually his entire position in SCIE, selling another 21.5 million shares of the 25 million shares he held, at an average price of about \$0.0015, about 400% over his average purchase price of \$0.0003. Between his sales, Gallagher had one strategically placed buy order entered for 1 million shares at a limit price of \$0.0016, just seconds after having executed a sell order of 1 million shares at \$0.0015. The buy order was evidently intended to give the false appearance of demand in the market, helping to maintain the price and sufficient liquidity, allowing Gallagher to continue selling. Indeed, about 10 minutes later, Gallagher entered a sell order for 3 million shares at \$0.0014 per share.

64. While Gallagher was selling his shares of SCIE on January 29, he tweeted buy or

hold touts about SCIE approximately 15 times. For example, Gallagher tweeted: “yes i’m holding \$scie. it benefits me in no way to sell. . . .”; “\$scie ill hold!”; and “Yes, I’m in \$scie it was my team play!”.

65. Gallagher knew these representations were false and misleading, as they misrepresented his own trading activity.

66. Between January 28 and 29, 2021, Gallagher sold 26,500,000 shares of SCIE, at prices ranging from \$0.0011 to \$0.0040, for a profit of approximately \$35,900.

67. A reasonable investor would have found it material to know that while Gallagher was encouraging his followers and readers to buy shares in SCIE, and while he was assuring them that he was “holding” SCIE; that he hadn’t sold a share; and that “it benefits me in no way to sell;” that Gallagher was in fact selling off virtually his entire position in SCIE.

68. Gallagher’s selling shares while encouraging others to buy those shares was material information that a reasonable investor would consider important to know in making a decision whether to buy shares of SCIE, or any of the other stocks Gallagher touted while selling, as it would indicate to investors that Gallagher was deceitful; that his advice to them was untrustworthy; and that he was encouraging them to buy shares of SCIE, and the other touted stocks, not because he thought that it would be beneficial to them to do so, but because it would benefit Gallagher if they bought shares, thereby raising the share price and Gallagher’s profit margin when he sold his shares and took advantage of that price increase and/or that increased demand for the shares, making it easier for Gallagher to sell his shares.

69. Gallagher failed to disclose this material information to his followers and readers.

70. It appears that Gallagher intended to engage in a second round of scalping of SCIE securities. He tweeted more false information about SCIE. For example, in a tweet dated

January 30, 2021, he said that “Someone is paying” SCIE’s regulatory fees and attached a misleading re-tweet of a 2016 article, “SpectraScience Announces First Use of WavSTAT4 Optical Biopsy System in Spain”, implying that SCIE had current operations. He also retweeted, “\$SCIE wavstat4 technology is distributed by Pentax throughout Europe”, falsely implying that SCIE had profitable, current business operations.

71. At the beginning of February, Gallagher bought more SCIE shares, buying 3 million shares on February 4, another 2 million shares on February 9 and another 2 million shares on February 10, 2021.

72. On the morning of February 11, 2021, the Commission announced it was temporarily suspending trading in SCIE because “certain social media accounts may be engaged in a coordinated attempt to artificially influence the share price of SpectraScience Inc. (OTC: SCIE), an inactive Minnesota-based corporation.”

73. On February 12, 2021 Gallagher sent a DM to a Twitter user: “scie was as good as i made it.”

74. After the trading suspension ended on February 26, 2021, the company’s common stock started trading on OTC Link’s Expert Market.⁴ The company had a “Delinquent SEC Reporting” and skull-and-crossbones “Caveat Emptor” designation on the OTC Markets website. In early March 2021, after the trading suspension was lifted, Gallagher sold his remaining shares of SCIE at prices that reduced his overall profits from this scheme to approximately \$22,000. On May 17, 2021, the Commission instituted proceedings to deregister the SCIE securities. The company has failed to respond to the order instituting deregistration proceedings and has been

⁴ Once a trading suspension ends, quoting and trading may resume in the “grey market” or on non-exchange venues, such as OTC Link’s Expert Market tier, which limits the publication of unsolicited quotes to broker-dealers rather than to the general public.

ordered to show cause why it should not be found in default and deregistered.

III. GALLAGHER'S PDPR SCALPING SCHEME

75. Gallagher made approximately \$116,000 in profits by engaging in a scheme to scalp shares of Marathon Group Corp., ("PDPR"), which he traded between February 1, 2021 and March 12, 2021. Gallagher's scalping of PDPR is also typical of his scalping in other securities listed in Attachment A.

76. PDPR, f/k/a Pediatrics Prosthetics, Inc., is a Wyoming corporation headquartered in Waterbury, Connecticut. PDPR's securities are not registered with the Commission. PDPR's common stock was quoted and traded on OTC Link under the ticker symbol PDPR, until the Commission suspended trading in its securities on February 19, 2021.

77. According to its most recent press release, dated September 5, 2019, PDPR was "engaged in web property development" and, through a subsidiary, had just entered the cannabis industry with three new products for people and pets. PDPR's most recent quarterly financial information submitted to OTC Markets, for the period ending June 30, 2019, was posted in August 2019. Since 2001, the company changed its name three times, adopting its current name in 2011.

78. On February 1, 2021, Gallagher sent a DM to a Twitter account: "pdpr right?" That day Gallagher bought approximately 20 million shares of PDPR for prices between \$0.0009 and \$0.0013 per share.

79. On February 2, 2021, Gallagher bought approximately 30 million shares of PDPR for prices between \$0.0012 and \$0.0017 per share.

80. On February 3, 2021, Gallagher sent several DMs to select Twitter associates, privately advising them to load up on PDPR in the morning. These private messages included:

“pdpr keep that under wraps” and “PDPR will be good today. id suggest go big. no noise out loud yet. between us.”

81. That day, Gallagher also began sending at least eight buy tweets to his followers and public viewers touting PDPR, including, for example, “Great market day! For all those that say @AlexDelarge6553 pumps and dumps can kiss my ass! \$pdpr up 164% 100% after alert!” and “\$PDPR! MY NEW #1 GET IT BEFORE CLOSE!! . . .”. Gallagher bought 1 million shares of PDPR but sold approximately 7 million shares of PDPR while tweeting buy recommendations that day.

82. On February 4, 2021, Gallagher sent approximately thirteen more public tweets touting PDPR, including: “LOOK AT \$PDPR ALERTED EARLY YESTERDAY!! NO PUMP AND DUMP HERE!” That day, despite his public tweets assuring his followers and readers that he was not engaged in a pump and dump, Gallagher in fact sold more than 6 million of his PDPR shares at prices ranging from \$0.0038 to \$0.0043 per share, generating profits of approximately \$17,700.00.

83. Gallagher knew these representations were false and misleading, as they misrepresented his own trading activity.

84. Again, Gallagher’s buy recommendations in his public tweets, which were often retweeted, were clearly relied upon by his Twitter followers and as well as other members of the public who read them, as evidenced by the responses to one of Gallagher’s February 4, 2021 tweets to buy PDPR, which included the following: (1) “Im in”; (2) “I’m in 😊🏠👍”; and (3) “I was a newbie a few months ago, but u were one of the first stock related profiles I followed.”

85. On February 5, 2021, Gallagher continued to tout PDPR with at least seven more tweets, including, “IF YOU SELL \$PDPR YOUR DUMB!” and “\$PDPR READ-BUY=GET

RICH!!” That day, Gallagher sold approximately 24 million shares of PDPR at prices ranging from \$0.0044 to \$0.0054 per share, generating profits of approximately \$89,000.

86. Gallagher continued to tout PDPR on Twitter from February 6 through February 11, 2021, such as, “\$pdpr is great and one of my favs long holds ill be adding all dips!” (“dips” is understood to mean a momentary decline in price per share) and “. . . \$pdpr alerts fire!!” while selling approximately 3.8 million more shares of PDPR on February 9, 10 and 12, 2021 at prices ranging from \$0.0030 to \$0.0042 per share, generating profits of approximately \$8,700.

87. A reasonable investor would have found it material to know that while Gallagher was encouraging his followers and public viewers to buy shares in PDPR, and while he was assuring them that “NO PUMP AND DUMP HERE” and “IF YOU SELL \$PDPR YOUR DUMB” and “\$pdpr one of my favs long holds,” that Gallagher was in fact selling off his shares of PDPR.

88. Gallagher’s selling of his PDPR shares while encouraging others to buy PDPR shares was material information that a reasonable investor would consider important to know in making a decision whether to buy shares of PDPR, or any of the other stocks Gallagher touted while selling, as it would indicate to investors that Gallagher was deceitful; that his advice to them was untrustworthy; and that he was encouraging them to buy shares of PDPR, and the other touted stocks, not because he thought that it would be beneficial to them to do so, but because it would benefit Gallagher if they bought shares, thereby raising the share price and Gallagher’s profit margin when he sold his shares and took advantage of that price increase and/or that increased demand for the shares, making it easier for Gallagher to sell his shares.

89. Gallagher failed to disclose this material information to investors.

90. On February 18, 2021, the Commission announced the temporarily suspension of

trading in PDPR securities “because of questions regarding the accuracy and adequacy of information in the marketplace about the Company and the market for its securities. Since late January 2021, PDPR’s share price and trading volume have increased in the absence of any publicly available news or current information from the Company, and certain social media accounts may be engaged in a coordinated attempt to artificially influence PDPR’s share price.”

91. After the Commission’s trading suspension ended on March 4, 2021, the company’s common stock started trading on OTC Link’s Expert Market. The company has a “Dark or Defunct” and skull-and-crossbones “Caveat Emptor” designation on the OTC Markets website. After the trading suspension was lifted, Gallagher sold his remaining shares of PDPR at prices that reduced his overall profits from this scheme to approximately \$114,000.

IV. GALLAGHER’S SCALPING AND MANIPULATIVE TRADING IN SPOM

A. Gallagher’s Initial SPOM Scalping Scheme

92. SPO Global, Inc. (“SPOM”) is a Delaware corporation headquartered in China whose common stock is quoted on OTC Link under the ticker symbol SPOM. The company’s business is described on OTC Markets to include sales of medical software and equipment.

93. Between February 2020 and February 2021, Gallagher engaged in a manipulative trading scheme that included multiple instances of scalping shares of SPOM, earning net trading profits of approximately \$197,000.

94. For example, during May 2020, Gallagher sold over 1.5 million shares of SPOM while tweeting hundreds of touts encouraging his Twitter followers and public viewers to buy SPOM.

95. On May 5, 2020, the day before selling SPOM shares, for instance, he tweeted, “\$spom just a thought if we tweet enough. \$spom will trend! you think that would get attention?”

just a thought!” and “all ya gotta do is hold! and \$spom will happen”.

96. On May 6, 2020, when Gallagher was selling shares of SPOM, he publicly tweeted multiple replies to other Twitter users telling them to buy or hold their shares, including, “\$spom is #gold who sells when its going up!” and “\$spom plenty of room to grow lets get buy! come on whos in!!!” and “I’m not selling this thing isn’t stopping up list soon, jump in tomorrow it got peoples attention today. go \$spom easily going over a buck”.

97. Gallagher continued to sell shares of SPOM from May 7, 2020 through May 20, 2020, while tweeting multiple buy touts, and not disclosing his selling, including publicly tweeting a response to another Twitter user: “Harry, I demand you buy \$spom no matter how little you buy. if you like money. I wanna see you rich!”

98. Gallagher’s tweets to the effect that he was recommending that his followers buy the stocks he was recommending because he wanted them to make money were intended to convince his followers to trust and rely on Gallagher’s recommendations.

99. A reasonable investor would have found it material to know that while Gallagher was encouraging his followers and readers to buy and hold shares in SPOM, and while he was assuring them that he was “not selling” SPOM, Gallagher was in fact selling off his shares in SPOM.

100. Gallagher’s selling shares while encouraging others to buy those shares was material information that a reasonable investor would consider it important to know in making a decision whether to buy shares of SPOM, or any of the other stocks Gallagher touted while selling, as it would indicate to investors that Gallagher was deceitful; that his advice to them was untrustworthy; and that he was encouraging them to buy shares of SPOM, and the other touted stocks, not because he thought that it would be beneficial to them to do so, but because it would

benefit him if they bought shares, thereby raising the share price and Gallagher's profit margin when he sold his shares and took advantage of that price increase and/or that increased demand for the shares, making it easier for Gallagher to sell his shares.

101. Gallagher failed to disclose this material information to investors.

B. Gallagher's Marking the Close of SPOM

102. Gallagher also engaged in manipulative trading of SPOM by repeatedly marking the close at the end of July 2020 and into early August 2020 in order to induce the purchase of SPOM securities by others.⁵ Specifically, between July 23, 2020 and August 3, 2020, Gallagher entered buy limit orders above the offer price (the price at which sellers were willing to sell their shares) just prior to the market close, with the intent to increase SPOM's end of day ("EOD") adjusted closing price, thereby creating the impression that the stock was increasing in value in order to induce others to purchase shares of SPOM.

103. The day before undertaking this manipulative scheme, Gallagher sent private DMs to other twitter users which indicated that Gallagher intended to use EOD trades as a means to manipulate SPOM's EOD share price.

104. To Twitter User A, Gallagher wrote: "...can you get a chart of the last few min of spom today? spom went nuts with some big buys eod and got a guy who putting something together for me".

105. To Twitter User B, Gallagher wrote: "A friend is putting a spom article together and massive buys eod".

⁵ "Marking the close" is the practice of attempting to influence the closing price of a stock by executing purchase or sale orders at or near the close of the market.

106. The references to “a guy who putting something together for me” and “A friend is putting a spom article together and massive buys eod” suggests that Gallagher was coordinating with an Associate to tweet an article touting SPOM as part of a coordinated effort to increase SPOM’s EOD share price to induce others to buy the stock.

107. Just prior to the close of trading on July 23, July 27, and July 28, 2020, Gallagher placed approximately eighteen EOD limit buy orders of SPOM at or above the offer price, with the intent of raising the adjusted closing price to induce others to buy the stock. For example, on July 23, 2020, between 3:54:39 p.m. and 3:59:52 p.m., Gallagher entered five buy SPOM limit orders above the offer price, which were executed shortly thereafter; on July 27, 2020, at 3:59:38 p.m., Gallagher entered three buy SPOM limit orders above the offer price, which were executed shortly thereafter; and on July 28, 2020, between 3:56:07 p.m. and 3:59:39 p.m., Gallagher entered ten buy SPOM limit orders above the offer price, which were executed shortly thereafter.

108. Gallagher’s EOD timing of these buy orders at limit prices above the market price indicates that his intent was to artificially raise the price per share of SPOM to induce others to buy it.

109. Gallagher’s manipulative EOD trading was detected by his broker (Broker A), who emailed him on July 29, 2020. The email had the subject line “Possible manipulative trading in your account” and said that, between July 23 and July 28, 2020, bids were executed in Gallagher’s account “which had the effect of raising the closing price of [SPOM]. This activity may be considered marking the close by regulators.”

110. Despite this email from Broker A, on July 29 and July 30, 2020, Gallagher again entered approximately thirteen EOD buy limit orders at or above the offer price.

111. Gallagher engaged in these trades with the specific intent that his EOD limit order

would artificially raise the price per share of SPOM, as reflected by one of his public tweets attempting to enlist the help of his Twitter followers and readers to manipulate SPOM's closing price on July 29, 2020: "Hey traders can you guys buy \$spom if it moves 1 penny I'll be green. Lets keep the green streak alive! Thank you in advance. .175 is a great buy price FYI".

112. By exhorting his followers: "Lets keep the green streak alive!" Gallagher was evidently telling his followers that if his scheme to mark the close is successful, SPOM's market price will close higher ("in the green") than the previous day.

113. Gallagher's reference to ".175 is a great buy price FYI" indicates that Gallagher was telling his followers and readers to enter buy limit orders at .175, a price he thought would artificially move SPOM's share price higher.

114. Gallagher admitted in tweets that his intent was to create, in essence, a manipulative flash mob who would engage in a coordinated action to enter buy limit orders above SPOM's bid and offer⁶, induce other traders to trade SPOM as a result of this market activity and, thereby, artificially increase SPOM's adjusted closing price. For instance, he tweeted: "Tried to push \$spom to 17 cents the last second buying 20K more shares. Didn't work. but got my shares under 17" and "Let's see if I can move \$spom to green made a few bucks today! Anyone wanna help!" and "I bought 50K shares EOD and will everyday. So flippers sell to me \$spom best OTC."

115. On July 29, 2020 at 3:32 p.m., Gallagher again showed his intent to manipulate SPOM's closing price when he publicly tweeted, "I'll be hitting \$spom at .17 come join me

⁶ The term "bid" refers to the highest price at which a person is offering to pay at any given time to purchase a stock. The term "ask" (or "offer") refers to the lowest price at which a person is offering to sell the stock.

move this. EOD [end of day]”. Between 3:51:58 p.m. and 3:59:49 p.m. that same day, Gallagher entered eight EOD SPOM buy limit orders at \$0.17, which was above the offer price.

Gallagher’s first limit order to buy 5,000 shares of SPOM at \$0.1700 was filled at \$0.1497 and his final buy limit order for 20,000 shares of SPOM at \$0.1700 was filled at \$0.1618, indicating that his EOD buy limit orders moved SPOM’s EOD price higher. SPOM’s adjusted closing price on July 29, 2020 was \$0.1579, also indicating that his EOD buy limit orders moved SPOM’s EOD price upwards. On this day, there was no current news to otherwise account for SPOM’s increase in its adjusted closing price.

116. On July 30, 2020, between 3:49:27 p.m. and 3:59:15 p.m., Gallagher entered five EOD SPOM buy limit orders for 25,000 shares — at and above the market price — in an attempt to manipulate the stock’s price by marking the close. The orders were executed shortly thereafter, before the market close.

117. On the morning of Friday, July 31, 2020, Broker A sent a second notification to Gallagher, stating, “Between 7/29/2020 and 7/30/2020 [Gallagher’s account] established a pattern of trading that could potentially be viewed as manipulative by outside regulators.”

118. Nonetheless, on July 31, 2020, Gallagher — yet again — entered two EOD limit orders above the offer price, to mark the close. At 3:56:17 p.m. that day, Gallagher entered a buy limit order for 10,000 shares of SPOM at \$0.1600, which was executed at the then market price of \$0.152. At 3:59:27 p.m., Gallagher entered a buy limit order for 3,000 shares of SPOM at \$0.1600, which immediately executed at the then market price of \$0.1537. SPOM’s adjusted closing price for the day was \$0.1537.

119. Broker A emailed Gallagher the following Monday, August 3, 2020, with a third warning that his trading in SPOM on July 31 appeared “as an attempt to uptick/stabilize the stock

price and/or mark the close.” Yet again, however, on August 3, Gallagher placed still another EOD order at 3:58:40 p.m. to buy 10,000 shares of SPOM. The order was filled.

120. Broker A then temporarily restricted Gallagher’s account to liquidating transactions only.

121. On August 12, 2020, Gallagher publicly tweeted: “Always love waking to my [Broker A] account restricted do to stock manipulation! Who would try to move \$spom EOD not me!”

122. Gallagher was evidently openly bragging about his manipulative trading by sarcastically denying it and treating his broker’s restriction of his account for manipulative trading as a joke.

123. As set forth above and below, Gallagher’s scheme to mark the close in SPOM was intended to raise the price of SPOM and induce others to buy shares of SPOM, thereby further raising SPOM’s price, so that Gallagher could increase the profits he generated when he sold SPOM shares as part of his scalping scheme.

C. Gallagher’s Follow-On SPOM Scalping Scheme

124. Gallagher’s marking the close of SPOM furthered his scalping scheme.

125. Over the twelve days Gallagher engaged in his marking the close scheme with SPOM, he simultaneously tweeted approximately one hundred touts, including: “buy \$spom be richer”, “SPREAD THE WORD RETWEET EQUALS A FOLLOW! BUY SPOM!!!” and “spread the word and buy \$spom”. Gallagher also sent multiple DMs urging his followers to buy SPOM.

126. On August 5, just two days after his last manipulative EOD trade in SPOM attempting to raise its share price, Gallagher began selling his SPOM shares, all the while

continuing to urge his followers and readers with dozens of tweets and DMs to buy SPOM.

127. From August 5, 2020 through September 15, 2020, for instance, Gallagher sold over 1.3 million shares of SPOM, all the while urging others to buy SPOM in tweets, DMs and through message boards in coordination with an associate. For example, on August 4, 2020, Gallagher publicly tweeted, “\$spom run has started! i think we see green every day for many days! load up! \$spom ers”. And on August 5, 2020, when he was selling shares of SPOM, Gallagher sent a DM to a Twitter user, “BUY ALL THE SPOM YOU CAN”.

128. On August 9, 2020, Gallagher sent a private message to an associate, “i have a spom army here”. The associate responded via DM, “I’ll contact my IHUB friends and hit 30 boards for SPOM”. (IHUB is understood to be a stock message board). Gallagher answered, “alright get the boys to push spom for a week”

129. On August 25, 2020, just before the market opened, Gallagher tweeted a red Alert: “\$SPOM BUY!!! ALERT!!!” (with a flashing GIF red siren ALERT) and, at noon that day, Gallagher tweeted a reply to a Twitter user who asked Gallagher for guidance on when to buy and sell SPOM: “i buy almost every dip and sell small on the rips (HAVENT SEEN A RIP IN A WHILE) into the ask not to hurt shareholders.” (“Rip” is understood by promoters such as Gallagher to refer to a rise in share price after a sharp decline). Gallagher did not disclose that, in reality, he had been selling SPOM for weeks and continued selling SPOM that same afternoon.

130. A reasonable investor would have found it material to know that while Gallagher was encouraging his followers and readers to buy shares in SPOM, Gallagher was in fact selling off his shares of SPOM.

131. Gallagher’s selling shares while encouraging others to buy those shares was

material information that a reasonable investor would consider it important to know in making a decision whether to buy shares of SPOM, or any of the other stocks Gallagher touted while selling, as it would indicate to investors that Gallagher was deceitful; that his advice to them was untrustworthy; and that he was encouraging them to buy shares of PDPR, and the other touted stocks, not because he thought that it would be beneficial to them to do so, but because it would benefit him if they bought shares, thereby raising the share price and Gallagher's profit margin when he sold his shares and took advantage of that price increase and/or that increased demand for the shares, making it easier for Gallagher to sell his shares.

132. Gallagher failed to disclose this material information to investors.

V. GALLAGHER'S MARKING THE CLOSE OF BZWR

133. Gallagher also engaged in manipulative trading to mark the close of shares in Business Warrior Corporation, ("BZWR"), whose common shares trade on OTC Link, in order to create the artificial impression that the stock price was rising, in order to make the stock look more attractive to potential investors and induce them to buy the stock.

134. On March 2, 2021 at 3:59:25 p.m., Gallagher entered a buy limit order for 120,000 shares of BZWR at \$0.2400 per share. This limit price was above the ask of \$0.2220. Placing the limit order at \$0.2400 made no legitimate economic sense; it was instead intended to raise the share price, as Gallagher was offering to pay a higher price per share than was being offered. The order was partially filled before market close at prices between \$0.222 and \$0.2400. The day's adjusted close for BZWR was \$0.2400, the same price Gallagher's buy limit offer was partially filled at, indicating that his EOD order affected the adjusted close. Gallagher profitably sold these shares the next day.

135. Likely emboldened by the success of this manipulation, the next day Gallagher

sent multiple DMs and a tweet attempting to engage in a coordinated manipulative effort to mark the close of BZWR.

136. On March 3, 2021, Gallagher sent a private DM to an associate: “how much bzwr you have” adding, “i can move it 10 cents eod”. The associate replied, “I can slap end of day too”. (This is understood to be the associate agreeing to also place EOD buy limit orders along with Gallagher’s EOD orders to manipulate the day’s closing price). Gallagher sent another DM to the same associate that say saying: “AGAIN PUT A DUMB HIGH BZWR BUY YOU WIN BIG.”

137. Gallagher sent additional DMs on March 3 to as yet unidentified recipients, saying: WATCH BZWR FINISH”; “EOD we can smak bzwr 40 cents on little money”; “AGAIN GET BZWR BEFORE THE CLOSE!”; and he publicly tweeted: “If you buy \$bzwr now! You be happy EOD”.

138. These DMs and tweet are understood to be Gallagher attempting to coordinate traders to place EOD buy limit orders above the bid and ask for no economic purpose except to artificially raise BZWR’s adjusted close.

139. Gallagher placed multiple EOD buy BZWR limit orders between March 3 and March 11, 2021.

140. Gallagher affected the adjusted closing price of BZWR by marking the close. For example, on March 5, 2021 at 3:59:08, Gallagher placed an initial buy limit order for 100,000 shares of BZWR at \$0.2700, even though the ask price at the time was only \$0.2092. At 3:59:37 p.m., on March 5, 2021, Gallagher placed a limit buy order for 20,000 shares of BZWR at \$0.2200, even though the ask price at the time was only \$0.2092. Neither of these buy orders above the ask price made economic sense and were intended to raise the stock’s closing price.

Gallagher's March 5, 2021 BZWR orders were filled at prices between \$0.2092 and \$0.2150 per share. The adjusted closing price of BZWR on March 5 was \$0.2150, the same as the price that Gallagher's buy order was partially filled at, indicating that his EOD orders affected that day's adjusted closing price.

141. In at least two instances, Gallagher marked the close of BZWR proximate to his scalping those shares, indicating that he used both manipulative strategies together to sell at a profit. For example, as described above, Gallagher marked the close of BZWR on March 2. The same day, Gallagher tweeted a tout list with "\$bzwr" as his #1buy pick. On March 3, as described above, Gallagher profitably sold shares of BZWR benefiting both from his scalping and having marked the close.

142. As described above, Gallagher also marked the close of BZWR at the EOD on March 5, 2021. On March 8, 2021, the next trading day, Gallagher tweeted at least two touts to buy BZWR and then profitably sold 20,000 shares of BZWR the next day, indicating that he benefited from both his scalping and his having marked the close just days prior, on March 5, 2021.

VI. GALLAGHER'S ADDITIONAL SCALPING ACTIVITY

143. As summarized in Attachments A and B, Gallagher has engaged in scalping in connection with at least 60 issuers. With respect to each issuer, Gallagher failed to disclose material information, namely his intent to sell the Target Security and his actual sales of the Target Security — at the very time that he was recommending to his followers and other Twitter readers that they buy the stock.

144. The following are certain additional examples where Gallagher engaged in scalping by misrepresenting that he was buying stocks without disclosing that he was actually

selling them. For example, on February 18, 2021, Gallagher tweeted, “\$NTLK is a great dip buy right now! Ill join you”. Gallagher did not buy more shares of OTC ticker NTLK (“Net Talk.com”) but, instead, the next day sold over a million shares of NTLK.

145. On June 1, 2021, Gallagher tweeted, “1000s of DM yes people im still in \$vxit lol. Im not a dumper especially on my #1 im adding . . .”. In reality, Gallagher sold (“dumped”) hundreds of thousands of shares of OTC ticker VXIT (“VirExit Technologies”) on June 1, 2021 and the next day.

146. On June 30, 2021, Gallagher tweeted a red Alert, “\$dpls alert buy again on news from trips to 8 cents this isn’t stopping. LOI news!” Gallagher attached a flashing red “ALERT!!!!” GIF and a tweet from the company he was touting, DarkPulse Inc. That same afternoon, Gallagher sold 60,000 shares of OTC ticker DPLS (“DarkPulse, Inc.”).

147. Gallagher continued to sell shares of DPLS through July 28, 2021, while tweeting multiple touts, such as including DPLS on his lists of recommended buys and tweeting, falsely, on July 17, 2021 (two days after he sold 50,000 shares of DPLS and ten days before selling another 50,000 shares), that he was “Buying more!” Gallagher’s profits during the trading period in Attachment A, over which he scalped DPLS, were approximately \$87,000.

148. On September 9, 2021, Broker A informed Gallagher that it was terminating its relationship with him; closing his trading account effective October 9, 2021; immediately preventing him from making new stock purchases; restricting his account to just liquidating transactions; and advising him that it would not allow him to open a new account in the future.

149. Despite these warnings, Gallagher brazenly continued to engage in scalping in his Broker A account by tweeting about and selling shares that he already held in that account. For example, Gallagher continued to scalp shares of Astra Veda Corporation (OTC: “ASTA”),

whose common shares are quoted on OTC Link. From September 2, 2021 through September 28, 2021, Gallagher sold 5,000,000 shares while tweeting dozens of buy touts such as, “Be nice to each other and buy . . . \$asta . . .”, “Did you panic sell? I didn’t!” and “\$asta just buy the OTC gold”. Gallagher had over \$46,000 in net trading profits during the period in which he engaged in scalping ASTA.

150. Gallagher also continued to scalp shares of BZWR, which he traded from January 2021 through at least September 2021.

151. As part of this scheme, from September 14 through September 20, 2021, Gallagher tweeted approximately sixty touts, including, the day before he started selling, “Team \$bzwr know what you own! Get it! Hold it!” Over this same period, Gallagher, undisclosed, sold over 2.6 million shares of BZWR. From January 2021 through September 2021, a period over which Gallagher scalped BZWR, Gallagher made approximately \$155,000 in net trading profits.

152. In addition, on September 9, 2021, the same day that Broker A told Gallagher that it was shutting down his account, Gallagher opened a trading account at Broker B, stating that he intended to use the account for “active/day trading.” As of October 14, 2021, that account had approximately 40 stocks in it, with a market value of approximately \$1 million. Gallagher continued to engage in scalping in that account, undeterred by Broker A’s warnings and termination of his account.

153. For example, on October 12 and the morning of October 13, 2021, Gallagher sent multiple tweets encouraging his Twitter followers and public viewers to buy a stock with the OTC ticker AHFD (“Active Health Foods Inc.”). The afternoon of October 13, 2021, Gallagher sold that stock, reaping a quick \$1,800 profit.

154. On October 13, 2021, Gallagher tweeted, “\$cgac I’m just loading cheap”. In truth, Gallagher then proceeded to sell hundreds of thousands of shares of OTC ticker CGAC (“Code Green Apparel”) which he bought five days earlier.

155. Attached as Attachment B is a chart providing one instance for each of the 60 issuers where Gallagher issued a tweet encouraging his followers and readers to buy the particular stock before or while he was in fact selling his shares of that stock, without disclosing that he was selling his shares. With respect to a number of the days referenced in Attachment B, Gallagher tweeted multiple touts and/or sent multiple DMs regarding the referenced stock. And with respect to many of the 60 issuers, Gallagher engaged in scalping on multiple days.

156. With respect to each of these stocks, Gallagher failed to disclose to his followers and readers the material information that he was selling, or knew he was about to sell, shares of the stock when he was telling them to buy shares in these companies.

VII. GALLAGHER’S FRAUDULANT ACTS VICTIMIZED RETAIL INVESTORS

157. The AlexDelarge6553Victims@SEC.GOV email box has received dozens of emails from retail investors. Commission staff is in the process of contacting and interviewing these investors.

158. The victims interviewed to date comprise novice, Main Street retail investors, including active duty and retired military, persons on limited incomes and of moderate means, elderly persons and persons with health concerns who are on disability. The victims cited fifty-four issuers they invested in based on the Alerts and recommendations of @AlexDelarge6553, including certain issuers Gallagher is charged with scalping herein.

159. Gallagher’s failure to disclose that he was selling or about to sell shares while encouraging his Twitter followers and readers to buy those shares was integral to his scalping

scheme and harmed numerous investors.

160. As reflected in the summaries of the victim's interviews with Commission staff, victims reasonably relied upon Gallagher's advice because he portrayed himself as an experienced trader willing to help others benefit from his knowledge, and victims reasonably trusted Gallagher based on his tweets that said he wanted to raise money to fight cancer and to help people make money.

161. His victims believed the plain meaning of Gallagher's tweets: that Gallagher was buying the shares of the issuers he recommended, was holding his shares in issuers he represented he was holding, and was not selling his shares when he was telling his followers they should buy shares in the same company.

162. For example, Victim A works in the healthcare industry and is a novice investor who began trading during the pandemic. She began following @AlexDelarge6553 because he represented himself as a successful trader. She bought multiple tickers based on Gallagher's tweeting his "red Alerts" because she understood his alerts to mean that he was also buying the stock he was promoting. She also had confidence in Gallagher's alerts because he would retweet purported due diligence. She stated she lost "a few thousand dollars" as a result of investing based on Gallagher's tweets concerning OTC tickers BRLL, PDPR, SCIE, TSNP, among others.

163. Victim B is a novice investor who described himself to the Commission staff as disabled. He bought stock based on Gallagher's "buy" recommendations because "Alex Delarge" acted like he knew the owners of the issuers he was recommending and would tweet that certain companies "had a bunch of potential". He bought stock when Gallagher tweeted his "red Alerts" and trusted Gallagher because he believed that Gallagher was "doing something

good” by sharing investment tips. He sold his holdings when their value “plummeted” and he stated he lost approximately \$3,000.

164. Victim C is a novice investor and on active duty in the U.S. armed forces. He learned about @AlexDelarge6553 when browsing Twitter and began investing based on Gallagher’s alerts and recommendations because Gallagher gave the impression that he wanted to teach people investing strategies. He bought multiple securities based on “AlexDelarge’s” alerts but each time immediately lost money on his investment. He stated he lost approximately \$20,000 which he had borrowed from a family member to invest in OTC tickers EHOS, IPWG, SCIE, VXIT, among others.

165. Victim C stated that he would have wanted to know that when Gallagher was recommending that people buy the Target Securities, Gallagher was selling or about to sell his own shares and that he would not have bought his shares if Gallagher had made that disclosure.

166. Victim D is a novice investor who became aware of Gallagher’s alerts in December 2020 and began buying stocks based on them and on Gallagher’s representation that he was investing “for the long haul”. He specifically remembers Gallagher tweeting that “it was a good idea to hold” a specific stock. He stated he lost in the range of \$25,000 as a result of buying on Gallagher’s alerts regarding OTC tickers ENZC and HMDL, among others.

167. Victim D stated that he would have wanted to know that, when Gallagher was recommending that people buy the Target Securities, Gallagher was selling or about to sell his own shares and that he would not have bought his shares if Gallagher had made that disclosure because it would revealed that Gallagher was not giving honest stock recommendations.

168. Victim E has significant health challenges and survives on SSI Disability. In an attempt to improve her financial condition and assist her aged parents, she began buying stocks

based on Gallagher's recommendations around the end of 2020. She understood his buy alerts to mean that he was also either buying or holding the shares he was recommending and alerting.

169. For example, on February 9, 2021, Gallagher tweeted at least eight touts concerning OTC ticker IPWG ("International Power Group, Ltd.) including an "ALERT" and "Trust me! \$ipwg is a great buy right now!" The same day, Victim E bought 500,000 shares of IPWG. The next day, as Gallagher continued to tout the stock, she bought another 500,000 shares. On Monday February 15, by which point the stock had lost over 50% of its value, she sent a DM to Gallagher asking him, "Can you please tell me if you're still optimistic about IPWG?" Gallagher responded, "yes its only been a few days! patience pays. If you afraid get out im in big with many million shares." She responded "I have patience. I have 1.5 and in the negative big time so I can't sell. I'll hang in there." Gallagher responded, "lets make some money!! big week ahead".

170. Gallagher did not disclose to this victim that he had bought his shares on February 5, prior to his touting the stock to his victims, at a price of approximately \$0.0006 per share. On February 5, 2021, Gallagher sent DMs to Associates coordinating loading up on the stock, writing for instance, "ipwg txtm ehos watch these blow up next week and weeks to come. Join the ride". Gallagher started publicly tweeting touts the morning of February 9, including "\$IPWG CHALLENGE ALERT!!! I OWN AND LOVE THIS IMO THIS WILL RUN FOR DAYS!!". The same day, taking advantage of IPWG's over 900% price per share rise following his coordinated buying and his tweets, Gallagher began selling into his touts.

171. By February 15, when Gallagher told his victim that "patience pays", he had already profitably sold millions of shares of IPWG as part of his scalping scheme.

172. The Commission issued a trading suspension against IPWG on February 26, 2021 due to suspicious trading activity tied to social media. On March 20, 2021, after her investment in IPWG had declined by approximately 90% in value, Victim E sent a DM to Gallagher: “Greetings Alex, any words on IPWG. I noticed there has not been any updates on Twitter, YouTube or yahoo finance. Is there still hope?” Gallagher responded by blocking Victim E on Twitter and blocking her DM messages.

173. Victim E stated that she ended up losing nearly \$7,000, or three months of her savings, which she cannot recover, as a result of Gallagher’s scalping OTC tickers IPWG, MEDT, SCIE, and VXIT, among others. Gallagher’s net trading profits in IPWG while he was scalping the stock were over \$38,000.

174. Victim E stated that she would have wanted to know that when Gallagher was recommending that people buy the Target Securities, Gallagher was selling or about to sell his own shares and that she would not have bought his shares if Gallagher had made that disclosure because she trusted Gallagher and that would have revealed that Gallagher was misleading her.

175. Victim F described himself to the Commission staff as a retired, disabled military veteran. He recalled tweets by Gallagher that said, “No, I still have all this” and “I’m holding”, which gave him the confidence to trust Gallagher and follow his recommendations. Although he stated he lost “only” \$200, being disabled and retired it was a significant loss for him. He invested in OTC tickers SCIE and TXTM.

176. Victim F stated that he would have wanted to know that when Gallagher was recommending that people buy the Target Securities, Gallagher was selling or about to sell his own shares because he would have wanted to know that Gallagher was profiting at his expense; he further stated that he would not have bought his shares if Gallagher had made that disclosure

because it would have showed that Gallagher was being manipulative and he would not have followed his lead.

177. Victim G is a novice investor with a small business. He trusted Gallagher because he would tweet some research and background on the companies he was alerting and say things to the effect, “I’ll hold your hand and you’ll have some of the success I do”. Victim G stated he lost approximately \$12,000 as a result of buying based on Gallagher’s tweets regarding OTC ticker VXIT.

178. Victim G stated that he would have wanted to know that when Gallagher was recommending that people buy the Target Securities, Gallagher was selling or about to sell his own shares and that he would not have bought his shares if Gallagher had made that disclosure because it would have revealed that Gallagher’s strategy was different from what he was telling his readers.

FIRST CLAIM FOR RELIEF
Violations of Securities Act Section 17(a)

179. The Commission re-alleges and incorporates by reference here the allegations in paragraphs 1 through 178.

180. Defendant, directly or indirectly, singly or in concert, in the offer or sale of securities and by the use of the means or instruments of transportation or communication in interstate commerce or the mails, (1) knowingly or recklessly employed one or more devices, schemes or artifices to defraud, (2) knowingly, recklessly, or negligently obtained money or property by means of one or more untrue statements of a material fact or omissions of a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, and/or (3) knowingly, recklessly, or negligently engaged in one or more transactions, practices, or courses of business which operated or would operate as a

fraud or deceit upon the purchaser.

181. By reason of the foregoing, Defendant, directly or indirectly, singly or in concert, violated and, unless enjoined, will again violate Securities Act Section 17(a) [15 U.S.C. § 77q(a)].

SECOND CLAIM FOR RELIEF
Violations of Exchange Act Section 9(a)(2)

182. The Commission re-alleges and incorporates by reference here the allegations in paragraphs 1 through 178.

183. Defendant, directly or indirectly, alone or with one or more other persons: (1) effected a series of transactions in any security registered on a national securities exchange, any security not so registered, or in connection with any security-based swap or security-based swap agreement with respect to such security; (2) creating actual or apparent active trading in such security, or raising or depressing the price of such security; (3) for the purpose of inducing the purchase or sale of such security by others.

184. By reason of the foregoing, Defendant, directly or indirectly, alone or with one or more other persons, violated and, unless enjoined, will again violate Exchange Act Section 9(a)(2) [78i(a)(2)].

THIRD CLAIM FOR RELIEF
Violations of Exchange Act Section 10(b) and Rule 10b-5 Thereunder

185. The Commission re-alleges and incorporates by reference here the allegations in paragraphs 1 through 178.

186. Defendant, directly or indirectly, singly or in concert, in connection with the purchase or sale of securities and by the use of means or instrumentalities of interstate commerce, or the mails, or the facilities of a national securities exchange, knowingly or

recklessly (i) employed one or more devices, schemes, or artifices to defraud, (ii) made one or more untrue statements of a material fact or omitted to state one or more material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, and/or (iii) engaged in one or more acts, practices, or courses of business which operated or would operate as a fraud or deceit upon other persons.

187. By reason of the foregoing, Defendant, directly or indirectly, singly or in concert, violated and, unless enjoined, will again violate Exchange Act Section 10(b) [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5].

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that the Court enter:

I.

A Final Judgment permanently, restraining and enjoining Defendant and each of his respective agents, servants, employees, attorneys and other persons in active concert or participation with him who receive actual notice of the injunction by personal service or otherwise, from any ongoing and future violations of Securities Act Section 17(a) [15 U.S.C. § 77q(a)], Exchange Act Section 9(a)(2) [15 U.S.C. § 78i(a)(2)] and Exchange Act Section 10(b) [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5];

II.

A Final Judgment ordering Defendant to disgorge all ill-gotten gains and/or unjust enrichment received directly or indirectly, with pre-judgment interest thereon, as a result of the alleged violations, pursuant to Exchange Act Sections 21(d)(5) and 21(d)(7) [15 U.S.C. §§ 78u(d)(5) and 78u(d)(7)];

III.

A Final Judgment ordering Defendant to pay civil monetary penalties under Securities Act Section 20(d) [15 U.S.C. § 77t(d)] and Exchange Act Section 21(d)(3) [15 U.S.C. § 78u(d)(3)];

IV.

A Final Judgment permanently prohibiting the Defendant from participating in any offering of a penny stock, including engaging in activities with a broker, dealer, or issuer for purposes of issuing, trading, or inducing or attempting to induce the purchase or sale of any penny stock, under Exchange Act Section 21(d)(6) [15 U.S.C. § 78u(d)(6)]; and

V.

Granting any other and further relief this Court may deem just and proper.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands that this case be tried to a jury.

Dated: New York, New York
April 7, 2022

/s/ Kevin P. McGrath
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ATTACHMENT A

CHART OF GALLAGHER'S NET PROFITS DURING THE ANALYZED PERIOD

	Issuer	First Trade Date Analyzed	Last Trade Date Analyzed	Estimated Net Profits for Period Analyzed ^{1, 2}
1	HDII	12/24/2019	2/16/2021	\$77,500
2	SPOM	2/18/2020	2/24/2021	\$197,500
3	TLSS	4/29/2020	1/25/2021	\$40,900
4	INQD	5/22/2020	2/18/2021	\$36,300
5	UAPC	6/14/2020	2/26/2021	\$35,100
6	CGLD	6/26/2020	7/24/2020	\$13,300
7	ENZC	7/14/2020	3/19/2021	\$159,800
8	DSGT	7/14/2020	11/25/2020	\$20,500
9	JADA	7/20/2020	1/13/2021	\$4,700
10	XTRM	7/28/2020	2/26/2021	\$36,100
11	EVUS	8/5/2020	11/12/2020	\$2,700
12	GLCO	8/16/2020	8/19/2020	\$16,000
13	CMGO	8/25/2020	12/8/2020	\$6,000
14	CBBT	8/26/2020	2/26/2021	\$84,600
15	CBDD	8/26/2020	2/18/2021	\$36,800
16	DPLS	8/31/2020	7/28/2021	\$87,400
17	COUV	10/9/2020	2/25/2021	\$41,500
18	BRNW	10/27/2020	2/26/2021	\$29,600
19	TSNP	11/10/2020	2/5/2021	\$298,900
20	LFER	11/23/2020	2/17/2021	\$15,800
21	AFOM	11/30/2020	1/19/2021	\$46,700
22	EHOS	12/3/2020	2/19/2021	\$21,500
23	SCIE	12/6/2020	3/5/2021	\$22,000
24	ALPP	12/8/2020	3/11/2021	\$471,200
25	DCLT	12/9/2020	3/5/2021	\$7,000
26	MEDT	12/10/2020	3/19/2021	\$10,200
27	CSLI	12/14/2020	2/19/2021	\$11,800
28	BNGO	12/17/2020	2/4/2021	\$96,700
29	BMIX	12/21/2020	2/18/2021	\$56,500
30	PTTN	12/21/2020	2/17/2021	\$23,300
31	GTLL	12/24/2020	3/5/2021	\$27,900
32	BLSP	12/29/2020	3/15/2021	\$48,000
33	GHST	1/4/2021	1/7/2021	\$10,300
34	EVTI	1/6/2021	2/19/2021	\$24,200
35	BZWR	1/7/2021	9/20/2021	\$155,200
36	LMFA	1/8/2021	1/29/2021	\$41,400
37	CHNC	1/11/2021	2/19/2021	\$46,900
38	ATOS	1/19/2021	2/9/2021	\$53,500
39	ARST	1/19/2021	2/26/2021	\$14,200

	Issuer	First Trade Date Analyzed	Last Trade Date Analyzed	Estimated Net Profits for Period Analyzed ^{1, 2}
40	TSOI	1/20/2021	3/5/2021	\$28,000
41	SHOM	1/25/2021	2/18/2021	\$46,800
42	INND	1/27/2021	2/19/2021	\$30,000
43	PDPR	2/1/2021	3/12/2021	\$114,300
44	NTLK	2/1/2021	2/19/2021	\$38,400
45	PHBI	2/1/2021	2/26/2021	\$31,700
46	TXTM	2/4/2021	2/9/2021	\$72,800
47	IPWG	2/5/2021	3/12/2021	\$38,500
48	BOTY	2/5/2021	2/23/2021	\$36,000
49	BFCH	2/8/2021	2/26/2021	\$55,600
50	BBDA	2/9/2021	2/19/2021	\$7,200
51	AZFL	2/10/2021	3/22/2021	\$6,700
52	DKGR	2/10/2021	2/19/2021	(\$4,500)
53	NOHO	2/23/2021	2/23/2021	\$28,200
54	DRNK	2/24/2021	3/19/2021	\$10,300
55	WTII	4/22/2021	8/20/2021	\$112,500
56	VXIT	4/29/2021	9/9/2021	(\$326,000)
57	ASTA	7/27/2021	9/28/2021	\$46,500
58	CGAC	10/8/2021	10/13/2021	\$600
59	AHFD	10/12/2021	10/13/2021	\$1,700
60	GEGP	10/13/2021	10/13/2021	\$800
Totals				\$2,805,600

1. The net profit for VXIT has been revised from the initial Complaint to a net loss. The revised calculation uses the cost basis of pre-merger shares Gallagher acquired when VXIT was named Poverty Dignified, Inc., (“PVDG”). The prior net profit used the cost basis of the stock post-merger when it converted to VXIT.

2. Net profits have been revised from the initial Complaint for the following issuers BBDA, BFCH, BRNW, BZWR, DKGR, DPLS, DRNK, GHST, HDII, IPWG, LMFA, NTLK, PDPR, PHBI, SHOM, SPOM, TLSS, TXTM, WTII to remove profits from trades in accounts in the name of Gallagher’s wife and son.

ATTACHMENT B
EXAMPLES OF GALLAGHER'S SCALPING IN 60 ISSUERS

1	Issuer: HDII
	Tweet: "\$hdii you'll want to load!" (1/25/2021)
	Sold: 705,500 shares HDII (1/25/2021)
2	Issuer: SPOM
	Tweets: "No selling for me today. I'm done shopping, now we make real money\$ \$spom"; (5/12/2020); "\$spom are we happy!! hold or buy the ask and we will get rich \$spom" (5/13/2020)
	Sold: 295,000 shares SPOM (5/13/2020); Sold 174,500 shares SPOM (5/14/2020)
3	Issuer: TLSS
	Tweet: "people buy \$tlss its on a dip read and learn value stocks ..." (6/23/2020); "Thursday list: 1 \$tlss ..." (6/25/2020)
	Sold: 600,000 shares TLSS (6/26/2020)
4	Issuer: INQD
	Tweet: "\$inqd!! never bailed!! Still holding my old two million shares!! i never sell bags i like." (2/4/2021)
	Sold: 500,000 shares INQD (2/5/2021)
5	Issuer: UAPC
	Tweet: "Great dip buys right now! ... \$uapc ..." (7/6/2020)
	Sold: 1,260,000 shares UAPC (7/7/2020)
6	Issuer: CGLD
	Tweet: "buy ... \$cgld tomorrow be happy" (6/28/2020)
	Sold: 10,000 shares CGLD (6/29/2020)
7	Issuer: ENZC
	Tweets: "Absolute must own OTC stocks!! ... \$enzc MILLIONS" (11/19/2020); "Buy before close today!! ... Now go buy this shit!!" (11/20/2020); "Anyone who knows me know I don't pump and dump! I can't say sell. Never have I alerted a stock and sold. ..." (11/21/2020)
	Sold: 600,000 shares ENZC (11/20/2020); Sold 50,000 shares ENZC (11/23/2020)
8	Issuer: DSGT
	Tweet: "ALERT BUY \$DSGT" (8/24/2020)
	Sold: 60,000 shares DSGT (8/24/2020)
9	Issuer: JADA
	Tweet: "Thursday must owns ... \$Jada" (7/29/2020)
	Sold: 50,000 shares JADA (7/30/2020)

10	Issuer: XTRM
	Tweet: "Alert buy \$xtrm before close" (9/2/2020)
	Sold: 700,000 shares XTRM (9/3/2020)
11	Issuer: EVUS
	Tweet: "Alert!! \$evus buy" (8/11/2020)
	Sold: 1,000,000 shares EVUS (8/11/2020)
12	Issuer: GLCO
	Tweets: "End of day buys . . . \$glco . . ."; "\$glco is a major buy!!" (red siren ALERT) (8/17/2020)
	Sold: 1,800,000 shares GLCO (8/18/2020)
13	Issuer: CMGO
	Tweet: "\$CMGO ALERT BUY" (8/27/2020)
	Sold: 400,000 shares CMGO (8/28/2020)
14	Issuer: CBBT
	Tweets: "Back to stocks must owns Monday!! 1. \$cbbt. . ." (10/18/2020); "Fucking buy!! \$cbbt im trying to get you rich!! its nothing but big green every day!!" (10/20/2020)
	Sold: 300,000 shares CBBT (10/20/2020)
15	Issuer: CBDD
	Tweet: "\$CBDD ALERT!!! LONG HOLD!!!! BUY" (11/16/2020)
	Sold: 642,000 shares CBDD (11/17/2020)
16	Issuer: DPLS
	Tweets: "Wednesday list! . . . \$dpls" (6/29/2021); "ALERT!!!! \$dpls alert buy again on news from trips to 8 cents this isnt stopping. LOL news!" (6/30/2021)
	Sold: 60,000 shares DPLS (6/30/2021)
17	Issuer: COUV
	Tweets: "\$scouv my #1 buy for Monday!!!" (1/1/2021); "Updated must own Monday 1 \$scouv long . . ." (1/3/2021)
	Sold: 60,000 shares COUV (Monday 1/4/2021)
18	Issuer: BRNW
	Tweet: "Friday list!! . . . \$brnw . . . Money list! You want these!" (2/25/2021)
	Sold: 2,000,000 shares BRNW (2/26/2021)
19	Issuer: TSNP
	Tweet: "\$tsnp alert buy this should be up 500% already!! Strong buy \$tsnp!! alert" (11/10/2020)
	Sold: 1,000,000 shares TSNP (11/10/2020)

20	Issuer: LFER
	Tweet: “ALERT BUY \$LFER YOU MUST BUY NOW MERGER NEWS MORNING GAP TO 10 CENTS ...” (11/24/2020)
	Sold: 176,662 shares LFER (11/25/2020) <i>(there was no merger news)</i>
21	Issuer: AFOM
	Tweet: “Challenge alert!! \$afom this runs like no other!! Load and hold this is a swing multiple pennies fast!! Buy \$afom 500% runner today” (12/1/2020)
	Sold: 13,000,000 shares AFOM (12/1/2020)
22	Issuer: EHOS
	Tweet: “\$ehos future alert! just sayin! And was a past alert! (2/11/2021)
	Sold: 5,000,000 shares EHOS (2/11/2021)
23	Issuer: SCIE
	Tweet: “\$scie! Challenge buy Alert trips to pennies hold and we all win big! . . . “ (with flashing red gif ALERT!!!) (1/27/2021)
	Sold: 7,000,000 shares SCIE (1/28/2021)
24	Issuer: ALPP
	Tweets: “My \$alpp confidence! Not selling a share!! . . .”; “Tuesday list!! Longs! . . . 1 \$alpp . . .” (12/21/2020)
	Sold: 10,000 (12/22/2020)
25	Issuer: DCLT
	Tweet: “Challenge Alert!! BUY \$DCLT (gif ALERT!!!!) (12/10/2020)
	Sold: 660,000 shares DCLT (12/10/2020)
26	Issuer: MEDT
	Tweet: “\$MEDT CHALLENGE ALERT!!” (2/4/2021)
	Sold: 3,800,000 shares MEDT (2/4/2021)
27	Issuer: CSLI
	Tweet: “\$csli challenge alert!! i’m loading \$csli!! anybody with me?” (gif ALERT!!!!) (12/14/2020)
	Sold: 500,000 shares CSLI (12/14/2020)
28	Issuer: BNGO
	Tweets: “...\$bng get your ass some shares! This is my second AH alert . . .” (12/29/2020); “\$bngo im holding its been up huge everyday” (1/2/2021)
	Sold: 10,000 shares BNGO (1/4/2021)

29	Issuer: BMIX
	Tweet: “Friday list! . . . \$BMIX. . .” (1/21/2021)
	Sold: 700,000 shares BMIX (1/22/2021)

30	Issuer: PTTN
	Tweets: “Tuesday list! . . . \$pttn . . . Best of the best!”; “Cheap runners big gain potential . . . \$pttn” (1/25/2021)
	Sold: 1,000,000 shares PTTN (1/26/2021)

31	Issuer: GTLL
	Tweet: “\$gtll long here! i don’t need pennies i want dollars!”; “Thursday list 1 \$gtll . . .”; DM to twitter user: “im not getting out of gtll” (1/20/2021)
	Sold: 1,000,000 shares GTLL (1/21/2021)

32	Issuer: BLSP
	Tweet: “Thursday list . . . \$BLSP . . .” (1/6/2021)
	Sold: 2,000,000 BLSP (1/7/2021)

33	Issuer: GHST
	Tweet: “In case you missed the runner! before it runs! load \$ghst!! its good” (gif Alert) (1/6/2021)
	Sold: 400,000 shares GHST (1/7/2021)

34	Issuer: EVTI
	Tweet: “Get rich quick list! . . . \$evti” (2/11/2021)
	Sold: 1,454,615 shares EVTI (2/12/2021)

35	Issuer: BZWR
	Tweets: “Buy \$bzwr hold”; “Trading tip! Buy \$bzwr long team build longs only!” (8/12/2021)
	Sold: 9,800 shares BZWR (8/13/2021)

36	Issuer: LMFA
	Tweet: “buy this at 7am est, this will fly for days \$lmfa” (1/10/2021)
	Sold: 25,000 shares LMFA (1/11/2021)

37	Issuer: CHNC
	Tweet: “Wednesday list! . . . \$chnc” (1/13/2021)
	Sold: 3,961,898 shares CHNC (1/14/2021)

38	Issuer: ATOS
	Tweet: “...big easy green no brainer holds . . . 2 \$atos” (2/4/2021)
	Sold: 21,000 shares ATOS (2/5/2021)

39	Issuer: ARST
	Tweet: "Friday ALERTS!! \$ARST . . . GOLD!!" (1/25/2021)
	Sold: 504,230 shares ARST (1/25/2021); Sold 1,495,770 shares ARST (1/26/2021)
40	Issuer: TSOI
	Tweets: "Zero! Hold long get rich stocks! . . . \$tsoi. . ." (2/9/2021); "I LOVE AND OWN \$TSOI" (2/10/2021)
	Sold: 50,000 shares TSOI (2/11/2021)
41	Issuer: SHOM
	Tweets: "Cheap runners big gain potential 100% - 100000% 1 \$shom hint wink"; "\$SHOM SELLERS ARE DUMB HOLD TIGHT PENNIES COMING AS PREDICTED!!" (1/26/2021)
	Sold: 3,521,232 shares SHOM (1/26/2021)
42	Issuer: INND
	Tweet: ". . . Buy \$innd lets all get greet! (gif Red ALERT!!!!)" (1/27/2021)
	Sold: 400,000 shares INND (2/4/2021)
43	Issuer: PDPR
	Tweet: "\$PDPR! MY NEW #1 GET IT BEFORE CLOSE!! GAP IN AM!" (2/3/2021)
	Sold: 6,652,401 shares PDPR (2/4/2021)
44	Issuer: NTLK
	Tweet: "NTLK is a great dip buy right now! Ill join you" (2/18/2021)
	Sold: 1,061,592 shares NTLK (2/19/2021)
45	Issuer: PHBI
	Tweet: "\$phbi!! I see this blowing up big!! read do your DD IMO we have a real winner here \$PHBI STRONG BUY ALERT!!!" (2/5/2021)
	Sold: 800,000 shares PHBI (2/5/2021)
46	Issuer: TXTM
	Tweet/Direct Messages: sends multiple DMs telling people to buy TXTM (2/8/2021); "\$TXTM AND \$PDPR RE THE BEST DIP BUYS!! i LOAD ALERT DIPS!" (2/9/2021)
	Sold: 5,147,813 shares TXTM (2/9/2021)
47	Issuer: IPWG
	Tweet: "\$IPWG CHALLENGE ALERT!! I OWN AND LOVE THIS IMO THIS WILL RUN FOR DAYS!! . . . STRONG BUY IN MY OPINION!!" (2/9/2021)
	Sold: 2,000,000 shares (2/9/2021); 4,591,737 shares (2/10/2021)

48	Issuer: BOTY
	Tweet: "Monday Fire . . . BOTY . . . All winners here!! Do your DD . . . Make money!" (2/7/2021)
	Sold: 3,000,000 shares BOTY (2/8/2021)
49	Issuer: BFCH
	Tweet: "...IMO \$BFCH IS CHEAP AND A GREAT BUY!! RUNS FOR DAYS!!" (2/9/2021)
	Sold: 135 shares BFCH (2/10/2021)
50	Issuer: BBDA
	Tweet: "\$bbda!! Challenge alert! \$BBDA IMO WILL SOAR TO NEW HIGHS!!" (gif ALERT) (2/11/2021)
	Sold: 5,000,000 shares BBDA (2/11/2021)
51	Issuer: AZFL
	Tweets: "\$AZFL THIS IS AGREAT BUY!! BIG GREEN NEXT WEEK!! IMO!"; "AZFL!! LETS GET YOU RICH" (2/12/2021); "Part 3 cheap otc's . . \$azfl . . . Do your DD find the real gems!" (2/13/2021)
	Sold: 1,000,000 shares AZFL (2/17/2021)
52	Issuer: DKGR
	Tweet: ". . . \$DKGR IS A GREAT BUY RIGHT NOW" (gif ALERT) (2/12/2021)
	Sold: 3,412,723 shares DKGR (2/12/2021)
53	Issuer: NOHO
	Tweets: "Hey!! \$noho people my only new buy today!!" (gif neon NEW!!); ". . . \$noho s !!! here we go!!" (2/23/2021)
	Sold: 20,000,000 shares NOHO (2/23/2021)
54	Issuer: DRNK
	Tweet and Direct Messages: "Thursday list!! . . . \$drnk . . . Money list! You want these!" (2/24/2021); DM from Gallagher to Associate: "ILL TELL THE TEAM AFTER YOU . . . YES DRNK" (2/24/2021)
	Sold: 9,000,000 shares DRNK (2/25/2021)
55	Issuer: WTII
	Tweets: "\$wtii I'm just adding and adding . . . its such great value" (7/22/2021)
	Sold: 130,000 shares WTII (7/23/2021)
56	Issuer: VXIT
	Tweet: "1000s of DM yes people im still in \$vxit lol. I'm not a dumper especially on my #1 im adding. . . ." (6/1/2021)
	Sold: 742,918 shares VXIT (6/2/2021)

57	Issuer: ASTA
	Tweet: “Friday list! . . . \$asta . . .” (9/9/2021)
	Sold: 59,405 shares ASTA (9/10/2021)

58	Issuer: CGAC
	Tweet: “\$cgac I’m just loading cheap” (10/13/2021)
	Sold: 858,133 shares CGAC (10/13/2021)

59	Issuer: AHFD
	Tweet: . . . “Big green stocks today! . . . \$ahfd . . . “ (10/13/2021)
	Sold: 1,000,000 shares AHFD (10/13/2021)

60	Issuer: GEGP
	Tweet: “\$gegp next leg coming” (retweeting tout) (10/13/2021)
	Sold: 1,000,000 shares GEGP (10/13/2021)